



WALTHAM FOREST COUNCIL FULL EQUALITY ANALYSIS (EA) TEMPLATE

Decision **Council Tax Support Scheme – from 1 April 2019**

Date **November 2018**

What is an Equality Analysis (EA) for? [Double click here for more information / Hide](#)

The Council must have due regard to its Public Sector Equality Duty (PSED) when making decisions at member and officer level. An EA is the best method by which the Council can provide the evidential analysis to comply with the equality duty, particularly for major decisions. However, the level of analysis required should only be proportionate to the relevance of the duty to the service or decision. Some decisions will require detailed equalities consideration, e.g. a decision on adult

social care provision or reduction of grants to voluntary organisations, whereas the performance of other functions will have less of an equalities impact, e.g. the appointment of committees where only a limited assessment is required. In rare cases, the Courts have said there may be no impact. If you think this may be the case, then you should undertake the EA screening process first to determine if you need to complete this full EA and have a rational basis for this conclusion.

What is the Public Sector Equality Duty (PSED)? [Double click here for more information / Hide](#)

The public sector equality duty (s.149, Equality Act 2010) requires the Council, when exercising its functions, to have “due regard” to the need to:

5. eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited under the Act,
6. advance equality of opportunity between those who share a “protected characteristic” and those who do not share that protected characteristic and
7. foster good relations between persons who share a relevant protected characteristic and persons who do not share it (this involves having due regard, in particular, to the need to (a) tackle prejudice, and (b) promote understanding).

These are collectively referred to in this EA as the equality aims. Advancing equality (the second equality aim) involves having due regard, in particular, to the

need to:

- Removing or minimising disadvantages suffered by people due to their protected characteristic
 - Taking steps to meet the needs of people from protected groups where these are different from the needs of other people including steps to take account of disabled people’s disabilities *and*
 - Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low
- NB Please note that, for disabled persons, the Council must have regard to the possible need for steps that amount to positive discrimination, to “level the playing field” with non-disabled persons, e.g. in accessing services through dedicated car parking spaces.

IMPORTANT NOTES:

1. **THIS FRONT SHEET IS AN ESSENTIAL PART OF THE EA – COMPLETE THE TEMPLATE AND SUBMIT IT AS A SINGLE DOCUMENT.**
2. **IN RARE CASES, WHEN COMPLETING THE ASSESSMENT IT MAY BECOME APPARENT THAT THE RECOMMENDATIONS WOULD LEAD TO UNLAWFUL DISCRIMINATION E.G. A PROPOSAL TO PAY MEN MORE THAN WOMEN. IF SO, STOP, RECONSIDER YOUR PROPOSAL AND SEEK ADVICE.**

THE HEAD OF SERVICE OR DIRECTOR WHO IS RESPONSIBLE FOR MEMBER LEVEL REPORTS MUST BE SATISFIED WITH THE FINALISED EQUALITY ANALYSIS AND FOR MAJOR PROPOSALS, IT IS SENSIBLE TO ENSURE YOUR LEAD MEMBER HAS BEEN CONSULTED.

Fostering good relations [Double click here for more information / Hide](#)

Fostering good relations involves having due regard, in particular, to the need to tackle prejudice and promote understanding.

Protected Characteristics [Double click here for more information / Hide](#)

Protected Characteristics defined in the Act are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex and sexual orientation. Marriage and civil partnership are also a protected characteristic for the first equality aim to eliminate discrimination.

Guidance on compliance with the PSED for officers and decision makers [Double click here for more information / Hide](#)

To comply with the duty, the Council must have “due regard” to the three equality aims. This means the PSED must be considered as a relevant factor in a decision alongside other relevant matters such as budgetary, legal, economic and practical implications. What regard is “due” will depend on the circumstances of each proposal and importance of equalities to the decision being taken. Some key principles for compliance during the decision-making process are set out below:

1. The duty is mandatory and important and must be met by the decision-maker and not delegated.
2. EAs must be evidence based and accurate – negative impacts must be fully and frankly identified so the decision-maker can fully consider their impact.
3. There must be an assessment of the practical impact of decisions on equalities, measures to avoid or mitigate negative impact and their effectiveness.
4. There must be compliance with the duty when proposals are being formulated by officers and then by members or officers when taking the decision: the Council cannot rely on an EA produced after the decision is made but sometimes a “provisional” EA is appropriate e.g. before consultation on a proposal.
5. Officers and members making a decision where there is an equality impact must give conscious and open minded consideration to the impact of the duty on the decision, e.g. be prepared to change or amend a decision although negative equalities impacts does not stop a decision being made (see 7).
6. The duty is **not**, however, to achieve the three equality aims but to take them into account when making the final decision – therefore, **the duty does not stop difficult but justifiable decisions being made.**
7. The decision maker may take into account countervailing (i.e. opposing) factors that may objectively justify taking a decision which has negative impact on equalities, e.g. financial targets, value for money or service needs.
8. The duty is ongoing: EAs should be reviewed over time and there should be evidence of how impact will be monitored after the decision.
9. The above is a general guide to this changing area of law. You should also refer to the Council’s EA Page <http://forestnet.lbwf.gov.uk/index/residents-first/equalities/equality-analysis.htm> for more detailed guidance, and specific advice from the Council’s Equalities Lead should be sought on complex issues.

What to do if your proposal is scheduled for Cabinet/Committee? [Double click here for more information / Hide](#)

The Proposals *Click and hover over the questions to find more details on what is required*

1. What is the Proposal?

The Council offers assistance to working age residents in need to pay their Council Tax bill through a local Council Tax Support Scheme. The existing scheme is a continuation of the Council's first scheme that was introduced on 1 April 2013 to replace the previous national Council Tax Benefit scheme (abolished on 31 March 2013). However, to ensure that the Council's scheme is as close to self funding as possible scheme (meaning that it should cost roughly the same as the funding the Council receives from government with little or no financial subsidy from the Council) many elements have been changed over the life of each scheme to make it less generous. The main changes made when the current scheme was introduced from 1 April 2017 were:

A minimum award level of £1.00 per week was introduced- meaning residents that would otherwise be entitled to ninety-nine pence (£0.99 pence) or less support per week receive no help at all from the scheme.

The taper applied to a person's income when their income is higher than the amount we consider they need to live on was increased to 30 per cent (from 25per cent). This reduces support by an extra five pence for every pound the person has above what we consider they need to live on.

Other key elements of the earlier scheme were continued, such as:

The maximum level of support payable under the scheme remained at 76 per cent so working age recipients of support must pay at least 24 per cent of their Council Tax themselves.

The Council continued administering a discretionary fund of up to £750,000 to assist those suffering the greatest financial hardship.

Residents with capital / savings of £6000 or more are not entitled to receive support under the scheme.

The proposal now is to continue with the current scheme which incorporates the changes outlined above in 2019-20. The remaining elements of the scheme are as published on the Council's website.

2. What are the recommendations?

The recommendation is that the Council continues with the current scheme described above in 2019-20 with only minor and consequential changes made to the scheme to reflect applicable Government changes to welfare benefits and Universal Credit. This would mean that from 1st April 2019 the maximum level of support available to people of working age will remain at 76% of someone's Council Tax liability. The remaining provisions of the council's scheme for 2019-2020 will continue as published in the updated provisions on the Council's website.

3. Who is affected by the Proposal? *Identify the main groups most likely to be affected by the recommendations, directly and indirectly.*

These proposals affect people of working age that are on low incomes as the scheme is means tested. Therefore all recipients would be considered to be at a socio-

economic disadvantage, particularly disabled people, lone parents (more likely to be women), part time workers (more likely to be women), large households (more likely to be from BME backgrounds) and young single people due to the greater impact the Governments welfare reform programme has had on this group.

However, the fact that these proposals recommend no change to the existing CTS scheme, there are no additional adverse impacts identified as a direct result of the proposal.

Age [Double click here to add impact / Hide](#)

Check box if NOT applicable ☐

Key borough statistics: Waltham Forest has an estimated total population of 275,800 as at June 2016. It has a higher proportion of young and working-age people compared to the national average with one in ten residents age over 65 compared to 18% nationally. The median age of residents is 34 years compared to the UK average of 40 years. It has significantly more working-age adults (68%) compared to the country as a whole (63%)

	Waltham Forest	Waltham Forest (%)	London (%)	England and Wales (%)
Aged 0-4	22,100	8%	7%	6%
Aged 5-15	37,000	14%	13%	13%
Aged 16-24	28,800	11%	11%	11%
Aged 25-49	115,400	43%	42%	34%
Aged 50 – 64	40,000	15%	15%	18%
Aged 65+	27,900	10%	12%	18%
Total	271,200	100%	100%	100%

Source: 2014 Mid-year population estimates, Office for National Statistics

For more detailed breakdowns or further information please contact Insight and Performance Team (ed.maguire@walthamsforest.gov.uk, ext. 4855).

[Double click here to show borough wide statistics / hide statistics](#)

Age [Click and hover over the questions to find more details on what is required](#)

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

There are approximately 104,639 Council Tax payers in Waltham Forest of which 17,575 (16.78%) 10.54% households were receiving Council Tax Support (CTS) in September 2018, including pensioners. Working age households accounts for 11,027 of recipients on CTS (and would be affected by the Council's scheme), which represents around 10.54% of Council Tax payers. Pensioner claims represents 6.24% of the total number of Council Tax dwellings.

Age *Click and hover over the questions to find more details on what is required*

CTS caseload October 2017 (18,811)		
Age	Number	Percentage
18-24	322	1.71%
25-49	7,200	38.28%
50-64	4,792	25.31%
65+	6,527	34.70%
	18,81	100%

CTS caseload data September 2018 (17,575)		
Age	Number	Percentage
18-24	225	1.28
25-49	6,358	36.18
50-64	4,548	25.88
65+	6,444	36.66
	17,575	100%

What is the proposal's impact on the equalities aims? Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact**

Analysis of the data shows that residents' age 65+ makes up 10% of the population and 36.66% of CTS claims at September 2018, an increase of 1.96% compared to October 2017. Notably claims from household under age 50 decreased over that period whilst there was an increase in percentage terms from 50 upwards. This suggests that we are likely to experience an increased number of pensioner claimants in the future. However, pensioners are not impacted by the Council's scheme as they are protected by a separate scheme which is set in legislation. The scheme for people of pension age is more generous than the Council's scheme including, most notably, a maximum reduction equal to 100% of the Council Tax bill.

18-24 year olds are under represented as a category in the CTS caseload compared to the population however, this could be because they are more likely to live in shared accommodation or live at home as part of a family and are therefore less likely as a group to be liable to pay Council Tax.

One third 33% of 25-49 year olds are in work compared to 14.5% of people aged 50 – 64 and 10.29% of 18-24 year olds. Which, given their representation in the caseload suggests that they as a group could be disproportionately impacted by any negative changes to the CTS scheme.

The proposal is to continue with the existing scheme and this analysis has not identified any additional adverse impact on this group arising from the proposal.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

The proposal in this Impact Analysis is a positive one as it makes recommendations for the Council to continue with its existing CTS scheme. Therefore there are no additional adverse impacts on this protected group resulting from these proposals.

Measures that have already been put in place to mitigate against the potential impact of the Council's existing scheme includes:

The scheme ignores war widows/widowers pensions as well as various other incomes, for example Child Benefit, Disability Living Allowance and Personal Independence Payments.

The scheme is complemented by a Discretionary Council Tax Hardship Fund to support those individuals suffering the most financial hardship. This fund offers short (and where necessary long) term support for the most vulnerable households.

Council Tax payment options, such as 12 monthly and fortnightly instalments via direct debit and standing order are offered at the billing stage.

The availability of the Discretionary Council Tax Hardship fund is promoted through Council Tax Support notification letters, in Council Tax reminder and final notices, on the Council's website and via partners and advice and voluntary organisations throughout the borough.

Applications for assistance from other discretionary schemes such as Discretionary Housing Payment and the local Social Fund scheme are monitored and where

Age *Click and hover over the questions to find more details on what is required*

appropriate assistance is awarded under the Discretionary Council Tax Hardship fund as well.

Affected households are actively supported to move into work where possible through referral into the council's Business, Employment and skills provisions. Those residents that require training or improved language skills will be sign posted to the Council's adult learning service.

Disability *Double click here to add impact / Hide*

Check box if NOT applicable ☐

Key borough statistics: The 2011 Census asked people to rate their health as very good, good, fair, bad or very bad. The data shows that a total of 13,500 residents of Waltham Forest considered their health to be bad or very bad (5% of the population). In addition, the 2011 census asked people if they had a health problem or disability that has lasted or was expected to last for at least 12 months and which limited the person's day-to-day activities, either a little or a lot. As many as 37,600 residents said in the census that their day-to-day activities are limited because of their health. This is made up of seven per cent of population who said their day-to-day activities were limited a lot (17,900 people) and eight per cent whose activities were limited a little (19,700). In total, this is 15 per cent of residents compared to 18 per cent nationally.

Health tends to deteriorate further with age with more than half of residents aged 65 and over (57 per cent) having a limiting long-term health problem or disability. Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

For more detailed breakdowns or further information please contact Insight and Performance Team (ed.maguire@walthamsforest.gov.uk, ext. 4855).

Double click here to show borough wide statistics / hide statistics

Disability *Click and hover over the questions to find more details on what is required*

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

In September there were 17,575 households claiming Council Tax Support of which 6,548 are pensioners and therefore not impacted by the local Council Tax Support scheme. Of the working age cohort (11,027) that would be affected by any changes to the Council's scheme, 4,617 (26.58%) are recorded as having a disability. In addition 419 children (2.38% of households) are also recorded as having a disability.

We have no data breakdown on whether their disability falls within visual impairment, hearing impact or mobility difficulties. Local caseload data also shows that 1,484 households 8.44% had an individual who was caring for someone with a disability in September 2018 compared to (7.681%) in October 2017.

What is the proposal's impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

In terms of Council Tax Support disabled households are those where a state

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

The proposal in this Impact Analysis is a positive one as it makes recommendations

Disability *Click and hover over the questions to find more details on what is required*

disability related benefit is in payment. We recognise that disabled people are historically disadvantaged and face greater barriers when accessing information about services and therefore consider disabled households to be more vulnerable than other households.

Disabled claimants make up 26.58% per cent of the working age Council Tax Support caseload and have increased by five per cent (5.09% since October 2017). This is higher a representation than both the borough statistics 15% and the national average of 18%.

The proposal is to continue with the existing scheme and this analysis has not identified any additional adverse impact on this group arising from the proposal.

for the Council to continue with its existing CTS scheme. Therefore there are no additional adverse impacts on this protected group resulting from these proposals.

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Applications for assistance from other discretionary schemes such as Discretionary Housing Payment and the local Social Fund scheme are monitored and where appropriate assistance is awarded under the Discretionary Council Tax Hardship fund as well.

Affected households are actively supported to move into work where possible through referral into the council's Business, Employment and skills provisions. Those residents that require training or improved language skills will be sign posted to the Council's adult learning service.

Key borough statistics: In 2014, a total of 4,600 children were born in Waltham Forest. The General Fertility Rate (number of live births per 1,000 women aged 15-44) in the borough is 74.2 (3rd highest in London) compared to the London average of 63.3.

The borough also has the 7th highest teenage (under 18) conception rates of London Boroughs (26.2 compared to the London average of 21.5 per 1,000 female population aged 15 to 17). In 2014, there were 114 teenage conceptions with 62% abortion rate among 15-17 year olds in Waltham Forest (*Source: Office for National Statistics*).

Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

For more detailed breakdowns or further information please contact Insight and Performance Team (ed.maguire@walthamsforest.gov.uk, ext. 4855).

[Double click here to show borough wide statistics / hide statistics](#)

Pregnancy and Maternity [Click and hover over the questions to find more details on what is required](#)

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals.*

We have no local data regarding maternity and pregnancy.

We do however know that there are 7,652 working age women in receipt of Council Tax Support which represents 63.95% of the working age caseload. 3,847 of the working age households are lone parent households and 3,670 (95.40%) are women, therefore as a group they will be more adversely impacted than any other group.

See under Section "Sex".

What is the proposal's impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

We hold no data at a caseload level about maternity and pregnancy however as women represents almost 64.36% of the working age caseload this suggests that there could be a disproportionate impact on this group

The proposal is to continue with the existing scheme and this analysis has not identified any additional adverse impact on this group arising from the proposal.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

The scheme is complemented by a Discretionary Council Tax Hardship fund to support those individuals suffering the most financial hardship. This fund offers short (and where necessary long) term support for the most vulnerable households. Affected households will also be actively supported to move into work where possible through referral into the council's Business, Employment and skills provisions.

Key borough statistics: About half of Waltham Forest residents are White ethnic background (51%) and within this 33% are White British or Irish background. 18% are categorised as 'White Other', who are predominantly from the other European countries (Source: 2011 Census). About two thirds of the EU migration to Waltham Forest in the last five years originates from the Central and Eastern European countries such as Romania, Bulgaria and Poland (Source: DWP). The largest ethnicity in the borough is Asian (22% of the total population) including people of Pakistani (10%), Indian (4%), Bangladeshi (2%) and Other Asian (5%) backgrounds. 17% of the resident population is Black split by Black Caribbean (7%), Black African (7%) and Other Black (3%). 5% of the population have mixed/multiple ethnicities.

Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

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[Double click here to show borough wide statistics / hide statistics](#)

Race [Click and hover over the questions to find more details on what is required](#)

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

Providing ethnicity information as part of the CTS application process is discretionary so at present we only have data recorded for 69.02% of our claimants, which breaks down as follows:

Council Tax Support caseload (November 2017) where known 12,983 (69%)			Borough statistics where known	Council Tax Support caseload (September 2018) where known 10,939 (62.2%)		
Ethnic Group	Number	%		Ethnic Group	Number	%
White: British	2,433	11.81	33%	White: British	2,369	13.5
White: Irish	169	0.81		White: Irish	158	0.9
White: Any Other	2,399	11.63	18%	White: Any Other	2,221	12.6
Mixed: White & Black Caribbean	150	0.72	5%	Mixed: White & Black Caribbean	149	0.8
Mixed: White & Black African	87	0.42		Mixed: White & Black African	89	0.5
Mixed: White and Asian	46	0.22		Mixed: White and Asian	43	0.2
Mixed: Any Other	169	0.99		Mixed: Any Other	153	0.9
Asian/Asian British: Indian	158	0.76	4%	Asian/Asian British: Indian	210	1.2
Asian/Asian British: Pakistani	840	4.07	10%	Asian/Asian British: Pakistani	1,063	6.0
Asian/Asian British: Bangladeshi	183	0.88	2%	Asian/Asian British: Bangladeshi	224	1.3
Asian/Asian British: Any Other	1,084	5.24	5%	Asian/Asian British: Any Other	637	3.6
Black/Black British: Caribbean	952	4.61	7%	Black/Black British: Caribbean	898	5.1
Black/Black British: African	1,054	5.11	7%	Black/Black British: African	1,019	5.8

Race *Click and hover over the questions to find more details on what is required*

Black/Black British: Any Other	636	3.08	3%	Black/Black British: Any Other	595	3.4
Chinese	70	0.33		Chinese	62	0.4
Other Ethnic Group	1,182	14.39		Other Ethnic Group	1,049	6.0
Unknown	7,199	34.93		Unknown	6,636	37.8

What is the proposal's impact on the equalities aims? Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact**

There is no requirement for people applying for CTS to declare their ethnicity so the information available at a caseload level has been provided on a voluntary basis. Ethnicity information is known for around 62.2 of cases only.

The data above when analysed against the caseload suggests that most groups, regardless of ethnicity, have a lower percentage of people receiving CTS than their representation within the borough's population as a whole, where known. The borough level data when compared to the Council Tax Support data (where known) suggests that the most significant disparity is attributable to people who defined themselves as white (British, Irish & Other) 51% of the borough population compared to 27% of the Council Tax Support caseload., where ethnicity is known. However, the fact that CTS is paid to households on low income, may suggest that a larger percentage of white residents are in full-time or higher paid employment than some ethnic groups.

Wider empirical evidence available from sources such as the Department for Communities and Local Government suggests that culturally BME families are more likely to be larger households and comprising extended families, which suggests that they also occupy larger properties. This means that the effect of the maximum Council Tax Support being capped to 76%, a minimum award level of £1.00 would disproportionately impact on this group.

Asian as an ethnic group makes up 22% of the borough population but only 11.1% of CTS recipients.

The proposal is to continue with the existing scheme and this analysis has not identified any additional adverse impact on this group arising from the proposal.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

The proposal in this Impact Analysis is a positive one as it makes recommendations for the Council to continue with its existing CTS scheme. Therefore there are no additional adverse impacts on this protected group resulting from these proposals.

Measures that have already been put in place to mitigate against the potential impact of the Council's existing scheme includes:

The scheme ignores war widows/widowers pensions as well as various other incomes, for example Child Benefit, Disability Living Allowance and Personal Independence Payments.

The scheme is complemented by a Discretionary Council Tax Hardship Fund to support those individuals suffering the most financial hardship. This fund offers short (and where necessary long) term support for the most vulnerable households.

Council Tax payment options, such as 12 monthly and fortnightly instalments via direct debit and standing order are offered at the billing stage.

The availability of the Discretionary Council Tax Hardship fund is promoted through Council Tax Support notification letters, in Council Tax reminder and final notices, on the Council's website and via partners and advice and voluntary organisations throughout the borough.

Applications for assistance from other discretionary schemes such as Discretionary Housing Payment and the local Social Fund scheme are monitored and where appropriate assistance is awarded under the Discretionary Council Tax Hardship fund as well.

Affected households are actively supported to move into work where possible through referral into the council's Business, Employment and skills provisions. Those

Race *Click and hover over the questions to find more details on what is required*

residents that require training or improved language skills will be sign posted to the Council's adult learning service.

Religion or Belief *Double click here to add impact / Hide*

Check box if NOT applicable ☐

Key borough statistics: The borough also has a diverse range of faith communities. According to the 2011 Census, Christianity is the main religion in Waltham Forest, with 48 per cent of residents identifying as Christian. The second biggest religion is Islam with 22% of residents saying they are Muslims compared to 5% nationally. Other religions in the borough are Hindu (2.3% of residents), Buddhist (0.8%), Jewish (0.5%) and Sikh (0.5%). 18% of residents said they are secular/have no religion and 7% chose not to state their religion in the Census.

Waltham Forest has around 150 Christian Churches, 16 Muslim Mosques, 4 Hindu Temples, 3 Jewish Synagogues, 1 Sikh Gurdwara and 1 Tao Temple.

Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

For more detailed breakdowns or further information please contact Insight and Performance Team (ed.maguire@walthamsforest.gov.uk, ext. 4855).

Double click here to show borough wide statistics / hide statistics

Religion or Belief *Click and hover over the questions to find more details on what is required*

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

We do not currently hold any additional data at a caseload level on religion or belief.

What is the proposal's impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

The proposal is to continue with the existing scheme and this analysis has not identified any additional adverse impact on this group arising from the proposal.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

There is no evidence to suggest that there is an additional adverse impact to this group as a consequence of these proposals.

Key borough statistics: In total, there is approximately equal number of men and women living in Waltham Forest (2014 Mid-year population estimates, ONS). However, there is a growing gender imbalance as people get older. 47% of those aged 50 and over are male and 53% are female, compared to 51% male and 49% female among the residents aged under 50.

Age	Male	Female
Aged 0 to 15	51%	49%
Aged 16 to 24	51%	49%
Aged 25 to 49	51%	49%
Aged 50 to 64	48%	52%
Aged 65+	45%	55%
Total	50%	50%

Source: 2014 Mid-year population estimates, Office for National Statistics

Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

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Sex Click and hover over the questions to find more details on what is required

Additional Equalities Data (Service level or Corporate) Include data analysis of the impact of the proposals

Working age CTS caseload October 2017 - 11,966					Working age CTS caseload September 2018 – 11,027				
	Female	%	Male	%		Female	%	Male	%
CTS recipients by gender	7,652	63.40	4,314	36.60	CTS recipients by gender	7,097	64.36	3,930	35.64
Lone parent households	3,670	95.40	177	4.60	Lone parent households	3,292	95.92	140	4.08
Receiving a disability benefit	2,468	61.06	1,574	38.94	Receiving a disability benefit	2,796	60.56	1,821	39.44
In employment	2,069	58.68	1,457	41.32	In employment	1,655	59.47	1,128	40.53

What is the proposal's impact on the equalities aims? Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact**

The data above shows that there are a higher percentage of females claiming Council Tax Support compared to their representation in the LBWF population which suggests an almost 50/50 split between males and females. This over representation could partly be explained by the fact that around 36.39% live in lone parent households and are therefore more likely to be in part-time work or work fewer hours which may limit their household income meaning they are more likely to qualify for support. 3,432 of the total working age households are lone parent households and 3,292 (95.92%) are females.

Although there is a lower percentage of females in work and claiming Council Tax Support than men 23.32% of females compared to 28.70%, the actual numbers that could potentially be impacted by the maximum support cap at 76% is higher for females as the overall percentage of women in receipt of support is larger.

23.32% of the total female caseload is in employment. When compared between lone parent and non lone parent household the data confirms that 22.05% of none lone parent households are In employment compared to 24.79% of lone parent household. This suggests that working lone parents are more likely to be impacted by the income taper and the minimum award level within the scheme. However we also know that lone parent households are more likely to be working part-time hours due to child care commitments so are in reality less likely to have income above their assessed needs.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

The proposal in this Impact Analysis is a positive one as it makes recommendations for the Council to continue with its existing CTS scheme. Therefore there are no additional adverse impacts on this protected group resulting from these proposals.

Measures that have already been put in place to mitigate against the potential impact of the Council's existing scheme includes:

The scheme ignores war widows/widowers pensions as well as various other incomes, for example Child Benefit, Disability Living Allowance and Personal Independence Payments.

The scheme is complemented by a Discretionary Council Tax Hardship Fund to support those individuals suffering the most financial hardship. This fund offers short (and where necessary long) term support for the most vulnerable households.

Council Tax payment options, such as 12 monthly and fortnightly instalments via direct debit and standing order are offered at the billing stage.

The availability of the Discretionary Council Tax Hardship fund is promoted through Council Tax Support notification letters, in Council Tax reminder and final notices, on the Council's website and via partners and advice and voluntary organisations throughout the borough.

Sex *Click and hover over the questions to find more details on what is required*

Taking all the data into consideration it would suggest that women and lone parents in particular as a group would be more adversely impacted by any negative changes to the Council's scheme.

The proposal is to continue with the existing scheme and this analysis has not identified any additional adverse impact on this group arising from the proposal.

Applications for assistance from other discretionary schemes such as Discretionary Housing Payment and the local Social Fund scheme are monitored and where appropriate assistance is awarded under the Discretionary Council Tax Hardship fund as well.

Affected households are actively supported to move into work where possible through referral into the council's Business, Employment and skills provisions. Those residents that require training or improved language skills will be sign posted to the Council's adult learning service.

Sexual Orientation and Gender Reassignment *Double click here to add impact / Hide*

Check box if NOT applicable ☐

Key borough statistics: In 2014, 1.6% of adults in the UK identified their sexual identity as lesbian, gay or bisexual. This comprised of:

- 1.1% who identified as gay or lesbian
- 0.5% who identified as bisexual.

A further 0.3% of population identified their sexual identity as other, not falling into heterosexual/straight, gay/lesbian, or bisexual categories.

London had the highest percentage of adults identifying themselves as lesbian, gay or bisexual, at 2.6%.

The likelihood of an adult identifying as LGBT decreased with age. In 2014, 2.6% of adults aged 16 to 24 identified as LGBT, which decreased to 0.6% of adults aged 65 and over. (Source: Integrated Household Survey, Office for National Statistics).

Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

For more detailed breakdowns or further information please contact Insight and Performance Team (ed.maguire@walthamsforest.gov.uk, ext. 4855).

Double click here to show borough wide statistics / hide statistics

Sexual Orientation and Gender Reassignment *Click and hover over the questions to find more details on what is required*

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

We do not currently hold information at a caseload level on gender reassignment or on sexual orientation for those individuals living in single adult households.

What is the proposal's impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

This analysis found no evidence of any differential impact arising from these proposals when considered from the perspective of sexual orientation and gender reassignment

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

There is no evidence available to indicate if there could be a greater adverse impact to this group as a consequence of the proposal for the Council to continue with its existing Council Tax Support scheme.

Key borough statistics:

Marital and civil partnership status	Waltham Forest	%
All usual residents aged 16+	203,100	100%
Single	88,100	43%
Married	81,300	40%
In a registered same-sex civil partnership	700	0%
Separated	7,600	4%
Divorced or legally dissolved same-sex civil partnership	15,400	8%
Widowed or surviving partner from a same-sex civil partnership	10,000	5%

Source: 2011 Census

The Civil Partnership Act 2004 came into force on 5 December 2005. The Marriages (Same Sex Couples) Act made provision for the marriage of same sex couples in England and Wales with first marriages taking place on 29 March 2014. From 10 December 2014 civil partners were able to convert their civil partnership into a marriage.

Number of marriages/civil partnerships by area of formation

	2011	2012	2013	2014
Marriages	956	773	878	n/a
Civil partnerships (total)	30	18	31	8
..Civil partnerships (male)	16	16	20	5
..Civil partnerships (female)	14	2	11	3

Source: Office for National Statistics

Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

For more detailed breakdowns or further information please contact Insight and Performance Team (ed.maguire@walthamsforest.gov.uk, ext. 4855).

[Double click here to show borough wide statistics / hide statistics](#)

Marriage and Civil Partnership [Click and hover over the questions to find more details on what is required](#)

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

We know from our existing caseload that there were 11 claims in payment from same sex couples in October 2017 and 14 in September 2018; an increase of 27%. It is however not been possible to determine precisely how many of these couples are married or in a civil partnership.

What is the proposal's impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

Current data held suggests that same sex couples are very much underrepresented in benefit claims compared to heterosexual couples. This analysis found no evidence of any differential impact arising from these proposals when considered from the perspective of marriage or civil partnership

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

There is no evidence available to indicate that there would be a greater adverse impact to this group as a consequence of these proposals.

See pages 1 and 2 for full details of these two aims. This section seeks to identify what additional steps can be taken to promote these aims or to mitigate any adverse impact. Analysis should be based on the data you have collected above for the 8 protected characteristics covered by these aims. Remember, marriage and civil partnership is not covered.

Key borough statistics: According to the **Resident Insight Survey** (wave 13 conducted in Feb-Mar 2016), 77% of Waltham Forest residents feel that their local area is a place where people from different backgrounds get on well together.

Women are more likely than men to feel that people from different backgrounds are getting on well locally (81% compare to 74%). Young people aged 16-29 are most likely to feel people are getting on well (84%), while older residents aged 65+ are least likely to think so (66%). BME residents are more likely to think that people from different background are getting on well in their local area than White residents (83% compared to 74%), which is likely related to the different age profile of the BME and White populations.

The Living Together Survey from Dec 2015-Feb 2016 found that 62% of residents agreed that they have the opportunity to mix with people from different backgrounds to themselves. One fifth (20%) feel they do not really mix with people from different backgrounds. People in the north of the borough (Chingford) are least likely to feel they have opportunity to mix with people from different backgrounds to themselves (55% compared to 68% in Leytonstone, 63% in Walthamstow and 61% in Leyton). Younger and BME residents are more likely to mix with people from different background than older residents and those of White background. The survey also found that not enough mixing between people of different backgrounds and lack of understanding of each other are perceived to be the two main reasons which can stop people from getting on together.

Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

For more detailed breakdowns or further information please contact Insight and Performance Team (ed.maguire@walthamsforest.gov.uk, ext. 4855).

[Double click here to show borough wide statistics / hide statistics](#)

Additional Impacts on Advancing Equality & Fostering Good Relations [Click and hover over the questions to find more details on what is required](#)

Additional Equalities Data (Service level or Corporate)

The council's Council Tax Support scheme is means tested and therefore available to low income households. Therefore all recipients would be considered to be at a socio-economic disadvantage, particularly disabled people, lone parents (more likely to be women), part time workers (more likely to be women) and large households (more likely to be from BME backgrounds).

The proposal is to continue with the existing scheme with only minor changes made as a consequence of annual Government changes to Welfare Benefits and any changes to Universal Credit. Any changes to the level of support residents are entitled to will be communicated to them in writing. Council Tax payment options, such as 12 monthly and fortnightly instalments via direct debit and standing order are offered at the billing stage as a way of alleviating any financial impact Government changes as a whole will have on low income households. The availability of the Discretionary Council Tax Hardship fund will be promoted through Council Tax Support notification letters, Council Tax reminder and final letters, on the Council's website and via partners and advice and voluntary organisations throughout the borough.

Additionally we will ensure that the communication options and materials used are accessible, inclusive and effective.

Are there any additional benefits or risks of the proposals on advancing equality and fostering good relations not considered above?

What actions can be taken to avoid or mitigate any negative impact on advancing equality or fostering good relations not considered above? Provide details of how effective the mitigation will be and how it will be monitored.

Additional Impacts on Advancing Equality & Fostering Good Relations Click and hover over the questions to find more details on what is required

The proposal does not identify any additional benefits or risks other than those outlined above. Furthermore, the proposal is to continue the Council's existing scheme, meaning the proposal does not carry any additional impacts on any equality groups.

The proposal makes no changes to the Council's existing Council Tax Support scheme therefore no additional adverse impacts have been identified on any equality groups as a result of this analysis.

Conclusion

Consider the Guidance below and set out your conclusions from the equalities analysis of the 8 protected characteristics. If there are negative equalities impacts, but you think that the proposals should still proceed in the current or amended form, explain what the objective justification for this is, providing evidence as

appropriate. If it is helpful, refer to other documents e.g. the Cabinet report. You may find it helpful to identify one of the 4 outcomes below as being closest to your current proposals. (Use your conclusions as a basis for the "Equalities Implications" in the Cabinet report.)

This analysis has concluded that...

This analysis has not identified any additional equality impact as a result of these proposals. This means that those in receipt of support from April 2019 would continue to be required to pay at least 24% of their eligible Council Tax themselves, which is the same as the current requirement. There will be continued financial monitoring of the costs of the scheme and before any further changes are made to the scheme which could further reduce or remove benefits payable the Council would have to carry out a statutory consultation which would also identify any equality impacts. The Council will also keep under review this Equality Impact Analysis as part of its compliance with its' Public Sector Equality Duty.

Up to £750,000 will be made available under the continuation of a Discretionary Council Tax Hardship Fund to offer extra support to the most vulnerable residents and changes have been made to the scheme to allow officers to make awards from the fund without applications from residents where they believe it is appropriate to do so. This fund is administered alongside other discretionary funds such as Discretionary Housing Payment which provides additional support with rent and other housing costs and the Council's local Social Fund which provides much needed support for families in crisis to obtain food, essential furniture and white goods as well as meeting fuel costs.

The outcome following analysis of the impact indicates the impact to be outcome 3.

Outcome of Analysis Check one that applies

☐ Outcome 1

No major change required when the assessment has not identified any potential for discrimination or adverse impact and all opportunities to advance equality have been taken.

☒ Outcome 3

☐ Outcome 2

Adjustments to remove barriers identified by the assessment or to better advance equality. Are you satisfied that the proposed adjustments will remove the barriers identified?

☐ Outcome 4

Continue despite having identified some potential for adverse impacts or missed opportunities to advance equality. In this case, the justification should be included in the assessment and should be in line with the duty to have 'due regard'. For the most important relevant policies, compelling reasons will be needed. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact.

Stop and rethink when an assessment shows actual or potential unlawful discrimination.

Signed off by Head of Service:



Name: Nalda Russell-Stowe

Date: November 2018